



# Compliance Monthly News September 2023

## Form CRS Delivery Requirements

### Four instances:

1. New or prospective customers before or at the earliest of (a) recommendation of an account type, a securities transaction or an investment strategy involving securities; (b) placing an order for the retail customer; or (c) the opening of a brokerage account for the retail customer.
2. Existing customers to whom you recommended that the client: i) open a new account different from their current account(s); ii) roll over assets from a retirement account into a new or existing account or investment; or iii) be provided a new brokerage service or investment that does not necessarily involve the opening of a new account and would not be held in an existing account.
3. When completing change of broker dealer form
4. Existing customers upon request.

**The account cover page is to be used to confirm delivery of Form CRS.**

SECURE



EMAIL

**BAE SYSTEMS**

Type **Secure:** FIRST in the Subject line

From	mjh@trustmontgroup.com
To	ach@trustmontgroup.com
Cc	
Subject	Secure: Client Info

**erado**

Type **Secureit** anywhere in the body of the message

300 Brush Run Road  
Greensburg, PA 15601  
www.trustmontgroup.com  
724-665-5665

Secureit

This communication may contain privileged and/or confidential information. If you received this communication in error, please contact the sender immediately. The information contained in this email is not warranted as to completeness.

## If I'm not getting paid, is it still an OBA?

The short answer is **YES!**

If you are participating in an activity or organization that is not your securities business even if you are not being compensated for it, it is still an outside business activity.

A few possible examples: committee member for your church, member of an advisory board, treasurer of your child's sport club, board member for a non-profit organization, chairperson for your fraternity/sorority, foundation board member, on the board of directors for an association, member of a club where you also hold a title/board position, college alumni association member, notary that does not charge for services, etc.



## OFFICE CHECK-UP

- \*all marketing materials submitted for approval
- \*office personnel disclosed
- \*electronic device list up-to-date
- \*voicemail disclosure added to all phones used for business
- \*all personal accounts disclosed
- \*pre-clearances submitted
- \*monthly/quarterly logs completed
- \*quarterly political contributions logs submitted
- \*OBAs approved
- \*copy of all reports submitted
- \*use of online meetings approved
- \*professional designations up-to-date and maintained
- \*social media/website approved
- \*U4 up-to-date (<https://finpro.finra.org>)
- \*all customer complaints submitted (written or oral)
- \*IS YOUR CE COMPLETED??**

## ALL NEW BUSINESS NEEDS PRE-APPROVED

**NOTE: new business, CPFs, negative response letters, client account changes/add-ons and checks go to Audrey in operations**

## 2023 Webinar Schedule

\*takes place 2-3pm EST

- February 9, 2023
- May 11, 2023
- August 10, 2023
- November 9, 2023

\*\*links to register on the website\*\*